

1 KATHLEEN J. ENGLAND, Nevada Bar No. 206
2 **GILBERT & ENGLAND LAW FIRM**
3 610 South Ninth Street
Las Vegas, Nevada 89101
Telephone: 702.529.2311
E-mail: kengland@gilbertenglandlaw.com

5 JASON R. MAIER, Nevada Bar No. 8557
DANIELLE J. BARRAZA, Nevada Bar No. 13822
6 **MAIER GUTIERREZ & ASSOCIATES**
8816 Spanish Ridge Avenue
7 Las Vegas, Nevada 89148
Telephone: 702.629.7900
Facsimile: 702.629.7925
8 E-mail: jrm@mgalaw.com
djb@mgalaw.com

10 Attorneys for Plaintiffs William J. Berry, Jr.,
Cynthia Falls and Shane Kaufmann

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILLIAM J. BERRY, JR.; CYNTHIA
FALLS; SHANE KAUFMANN,

Plaintiffs

VS.

DESSERT PALACE, INC. d/b/a CAESARS
PALACE: et al..

Defendants

Case No.: 2:17-cv-00019-GMN-PAL

**STIPULATION AND REQUEST
FOR AN ORDER TO EXTEND
PLAINTIFF'S DEADLINE TO
RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT [ECF NO. 99]**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs WILLIAM J. BERRY, JR., CYNTHIA FALLS, AND SHANE KAUFMANN (“Plaintiffs”) and Defendant DESERT PALACE, INC., d/b/a CAESARS PALACE (“Caesars”), by and through their respective counsel of record, that the deadline for Plaintiffs to respond to Caesars’ motion for summary judgment [ECF No. 99] be extended for two weeks, from January 30, 2019 to and including **February 14, 2019**. Likewise, Caesars shall have an additional two weeks to file its reply brief up to and including **March 14, 2019**.

1 This extension was requested by Plaintiffs' counsel, who need additional time to
2 prepare and file a thorough opposition to this dispositive motion (that contains 37
3 exhibits alone), which was filed on January 9, 2019 after the Court issued a decision
4 denying the reopening of discovery. This brief extension will not unduly delay this
5 matter.

6 DATED this 23rd day of January, 2019. DATED this 23rd day of January, 2019.

7 **GILBERT & ENGLAND LAW FIRM**

7 **LITTLER MENDELSON, P.C.**

8

9 */s/ Danielle J. Barraza*
10 KATHLEEN J. ENGLAND
11 Nevada Bar No. 206
12 610 South Ninth Street
13 Las Vegas, Nevada 89101

14 JASON R. MAIER
15 Nevada Bar No. 8557
16 DANIELLE J. BARRAZA
17 Nevada Bar No. 13822
18 MAIER GUTIERREZ & ASSOCIATES
19 8816 Spanish Ridge Avenue
20 Las Vegas, Nevada 89148

21 *Attorneys for Plaintiffs William J.
22 Berry, Jr., Cynthia Falls and Shane
23 Kaufmann*

24 */s/ Patrick H. Hicks*
25 PATRICK H. HICKS
26 Nevada Bar No. 4832
27 3960 Howard Hughes Parkway, Ste. 300
28 Las Vegas, NV 89169

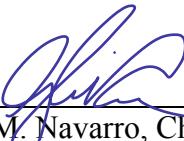
29 ESTHER G. LANDER (pro hac vice)
30 AKIN GUMP STRAUSS HAUER FELD LLP
31 1333 New Hampshire Avenue, NW
32 Washington, DC 20036-1564

33 WILLIAM J. EDELMAN (pro hac vice)
34 AKIN GUMP STRAUSS HAUER FELD LLP
35 580 California Street, Suite 1500
36 San Francisco, CA 94104

37 *Attorneys for Defendant Desert Palace,
38 Inc. d/b/a Caesars Palace*

39 **IT IS SO ORDERED.**

40 Dated this 23 day of January, 2019.

41 
42

43 Gloria M. Navarro, Chief Judge
44 UNITED STATES DISTRICT COURT